

**OFFICE OF THE FEDERAL PUBLIC DEFENDER  
FOR THE NORTHERN DISTRICT OF NEW YORK**

Syracuse Office

4 Clinton Square  
3<sup>RD</sup> FLOOR  
SYRACUSE, NY 13202  
(315) 701-0080  
(315) 701-0081 FAX

Lisa Peebles  
Federal Public Defender



Albany Office

54 State Street  
Suite 310  
ALBANY, NY 12207  
(518) 436-1850  
FAX (518) 436-1780

Paul Evangelista  
First Assistant

December 27, 2023

**BY ECF**

Honorable Mae A. D'Agostino  
United States District Judge  
Federal Courthouse  
445 Broadway  
Albany, New York 12207

Re: United States v. Dionisio Figueroa  
Case No. 23-cr-161 (MAD)

Dear Judge D'Agostino:

Please accept this letter as an application for an order modifying Mr. Figueroa's conditions of release to (1) allow Mr. Figueroa to have direct contact and/or third party contact with current or former employees of the U.S. District Court for the Southern District of New York.

On March 30, 2023, Mr. Figueroa appeared for arraignment before Magistrate Judge Andrew E. Krause in White Plains. He was released on that day, on conditions. Condition 7(g) states: (g) [Mr. Figueroa] avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution, including: CODEFENDANTS OR COCONSPIRATORS. "Witnesses" here includes current or former clients and current or former employees of Mr. Del Valle, and current or former employees of the U.S. District Court for the SDNY.

The modification is necessary so the defense can properly prepare for sentencing and to effectively seek and obtain character letters from persons that have known and worked with Mr. Figueroa for over twenty years. I have reached out to Assistant United States Attorney Frank Balsamello and the prosecution consents to the proposed modification.

If the Court agrees to the modification, we ask this letter be so ordered, thereby *modifying condition 7(g) allowing Mr. Figueroa to have direct and/or third party contact with current or former employees of the U.S. District Court for the Southern District of New York.*

Thank you for your consideration.

Respectfully submitted,

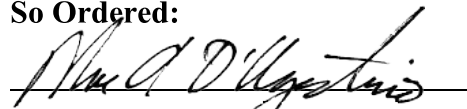
/s Paul J. Evangelista

First Assistant Defender  
Northern District of New York

cc: Counsel of Record (cm/ecf)

**Dated:** 1/2/2024

**So Ordered:**



**Hon. Mae A. D'Agostino**